

**IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

CONSOLIDATED RESPONSE IN OPPOSITION TO DEFENDANTS' MOTIONS TO DISMISS

Plaintiff Johnny M. Hunt, by and through the undersigned counsel, hereby respectfully submits his Consolidated Response in Opposition to the Motion to Dismiss filed by Southern Baptist Convention [D.E. 29], the Motion to Dismiss filed by Guidepost Solutions LLC [D.E. 25], and the Motion to Dismiss filed by the Executive Committee of the Southern Baptist Convention [D.E. 31] (hereinafter collectively the “Motions to Dismiss”).

As explained more fully in the accompanying Consolidated Memorandum of Law in Opposition to the Defendants' Motions to Dismiss, Plaintiff submits all the Motions to Dismiss should be denied in their entirety. Plaintiff incorporates by reference the arguments and authority set forth more fully in the accompanying Consolidated Memorandum of Law in Opposition to the Defendants' Motions to Dismiss.

Dated: June 9, 2023

Respectfully submitted,

s/ Andrew Goldstein

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CERTIFICATE OF SERVICE

I hereby certify that I caused a true and correct copy of the foregoing Consolidated Response in Opposition to Defendants' Motions to Dismiss to be electronically filed with the Clerk of the Court on June 9, 2023, using the CM/ECF system, which will automatically serve all counsel of record listed below:

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